

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABUDLRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**STIPULATION OF
VOLUNTARY DISMISSAL
WITH PREJUDICE AS AGAINST
NICHOLAS ELEFTERAKIS**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff IME WatchDog, Inc. and Defendant Nicholas Elefterakis, by and through their respective undersigned counsel, that – pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure – Plaintiff’s claims in the above-captioned case shall be dismissed in their entirety with prejudice and without costs or attorneys’ fees as against Defendant Nicholas Elefterakis.

DATED: January 15, 2023

Respectfully submitted,

/s/ Emanuel Kataev, Esq.

MILMAN LABUDA LAW GROUP PLLC

Emanuel Kataev, Esq.

Counsel for Plaintiff IME WatchDog, Inc.

/s/ Gennaro Savastano, Esq.

ELEFTERAKIS, ELEFTERAKIS & PANEK, P.C.

Gennaro Savastano, Esq.

Counsel for Defendant Nicholas Elefterakis

SO ORDERED:

Hon. Pamela K. Chen, U.S.D.J.